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## UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

Case No. 3:12-cv-02265-SI

v.

THE CITY OF PORTLAND,

DEFENDANT.

DEFENDANT CITY OF PORTLAND'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PORTLAND POLICE ASSOCIATION'S MOTION TO INTERVENE

Pursuant to Rule 6(b) of the Fed. R. Civ. P., defendant City of Portland hereby moves the Court for an order allowing an extension of time in which to respond to the Portland Police Association's (PPA) Motion to Intervene in this case. Specifically, Defendant City of Portland requests a two-week- extension of time, which would move the due date to January 22, 2013, from its current date of January 7, 2013.

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PORTLAND CITY ATTORNEY'S OFFICE 1221 SW 4TH AVENUE, RM 430 PORTLAND, OREGON 97204 PORTLAND (STY) A77 ORFICE 1221 SW 4TH AVENUE, RM 430 PORTLAND, OREGON 97204 (503) 823-4047 Pursuant to Local Rule 7-1, counsel for City of Portland conferred by phone with Plaintiff's counsel and conferred in-person with counsel for the PPA and neither opposes this motion. This motion is based upon the complete court file and upon the affidavit of Ellen Osoinach, filed herewith.

DATED: December 19, 2012.

/s/ Ellen Osoinach

Ellen Osoinach, OSB #024985 Deputy City Attorney Of Attorneys for Defendant City of Portland